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IN TUNE WITH YOUR MIND

June 15, 2004

Marlene H. Dortch, Secretary

Federal Communications Commission

Office of the Secretary

445 12th Street, SW

Washington, DC 20554

RE: MM Docket No. 99-325

Dear Ms. Dortch:

WBFO-FM, the National Public Radio (NPR) service of the University at Buffalo, would like to recommend the FCC adopt a DAB service that encourages more audio streams by way of multiplexed digital programming. The new technology, with supplemental audio channel capacity, will improve our level of public service. The "Radio Tomorrow" capacity will assist us in providing greater access to radio for all of the people of Western New York.

Authorization of the supplemental audio channel capability will encourage WBFO to actively pursue Digital Radio Conversion. Listeners come to our public radio station broadcasts because of our programming and the quality of our audio. HD Radio's improved sound quality and elimination of distorting interference are important factors that will motivate us to transition to digital broadcasting. We currently have an application before this round of NTIA/PTFP (Public Telecommunications Facilities Program) grants. This proposal seeks funds to increase the height of the WBFO antenna tower and

WBFO is a major public service of the University at Buffalo.

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install a H-ready antenna. Among the factors for my station to take full advantage of this new technology is the capability to serve supplemental audio programming.

WBFO's mission is to provide a significant public radio service to a significant number of people. Currently almost 100,000 people listen weekly. WBFO believes the use of supplemental audio is integral to our public service mission and enables us to expand programming to meet listener needs that are either undeserved or not served at all in the Western New York market. Presently WBFO is a split format radio service: half of our broadcast day is news and information with NPR, and half is music. We are often faced with making difficult decisions trying to serve two different audiences. WBFO would be able to use a supplemental audio channel to expand both our news and music programming initiatives.

We strive to provide quality, in-depth programming to listeners. Multiplexing of the digital audio signal enables us to provide programs to specific audiences that are currently under-served. In its simplest form, this could mean providing our main news programming on the primary channel, and an additional service such as our music programming on the supplemental channel. The supplemental audio channel provides WBFO with a very cost-effective means of expanding the quality and quantity of local, diverse programming thereby improving our overall offerings to the community.

We will be able to take advantage of our capacity to create, store and distribute our radio service that is available with the BE AudioVault and Logitek studio technology upgrade. In the digital platform we have already taken the first steps to improve the manner in which we gather, edit, organize, store,

communicate and disseminate information. The SAC will increase WBFO/NPR accessibility and visibility to reach new audiences and generate new revenue as a result of this essential technology.

An exciting aspect of the supplemental audio channel capability is its tremendous cost effectiveness. It presents enormous efficiencies compared to the difficulty and cost associated with acquiring additional frequencies. The resource savings that digital audio multiplexing will afford can be directed into programming that expands services.

The "Radio Tomorrow" technology will stand in support of the FCC's goal of fostering and protecting public service programming. Beyond authorizing the use of HD Radio technology to offer supplemental audio channels, the FCC's goals will be well served by providing non-commercial educational stations with maximum flexibility to serve the needs and interests of our listeners. Public radio stations share a mission to serve the public's educational needs and have a proven track record of successfully doing so. Public radio counts on the FCC to fully protect our ability to serve that programming mission.

Public radio stations also need to generate revenue to fund our activities. The potential use of SAC technology to achieve revenue gains will strengthen our ability to continue serving the public better into the future.

For all of the above reasons, we urge you to take positive action.

Sincerely,

Carole Smith Petro, Ph.D.

Carole Smith Petro

Associate Vice Present and

General Manager